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Attorneys for Proposed Lead Plaintiff Wai Lau

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CREIGHTON TAKATA, Individually and on
behalf of all others similarly situated,

Plaintiff,

v.

RIOT BLOCKCHAIN, INC. F/K/A, BIOPTIX,
INC., JOHN O'ROURKE, and JEFFREY G.
MCGONEGAL,

Defendants.

No. 3:18-cv-02293-FLW-TJB

**NOTICE OF WAI LAU'S MOTION FOR
APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF LEAD COUNSEL**

CLASS ACTION

Motion Date: May 21, 2018

PLEASE TAKE NOTICE that on or about May 21, 2018, or a date and time as may be set by the Court, at the United States District Court for the District of New Jersey, Wai Lau (“Lau”) as custodian for his minor children Klara Lau and Tyler Feng will respectfully move this Court, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), for entry of an order (1) appointing Lau as Lead Plaintiff in the above-captioned action; (2) approving Lau’s selection of Faruqi & Faruqi, LLP as Lead Counsel for the Class; and (3) granting such other and further relief as the Court may deem just and proper.

This motion is based on the accompanying Memorandum of Law in support hereof, the Declaration of Sherief Morsy filed herewith, the pleadings and other filings herein, and such other written and oral argument as may be permitted by the Court.

For the foregoing reasons, Lau respectfully requests that the Court (1) appoint Lau as Lead Plaintiff pursuant to the PSLRA; (2) approve Faruqi & Faruqi, LLP as Lead Counsel for the Class; and (3) grant such other and further relief as the Court may deem just and proper.

Dated: April 18, 2018

Respectfully submitted,

FARUQI & FARUQI, LLP

By: /s/ Sherief Morsy
Sherief Morsy (#125042015)

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*Attorneys for [Proposed] Lead Plaintiff Wai Lau
and [Proposed] Lead Counsel for the Class*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 18, 2018, I caused true and correct copies of the foregoing to be served on all counsel of record via CM/ECF.

Dated: April 18, 2018

By: /s/ Sherief Morsy
Sherief Morsy (#125042015)